

Federal Defenders
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August 15, 2024

The Honorable Pamela K. Chen
United States District Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: United States v. Douglas Noel, 23-CR-320 (PKC)

Dear Judge Chen:

Mr. Douglas Noel is currently scheduled to appear before the Court on August 22, 2024, for a status hearing. Mr. Noel is currently living with his mother in the District of Colorado and in compliance with all conditions of release. Defense counsel is in the process of preparing mitigation materials and the parties are engaged in plea negotiations. Additional time is required for the submission and review of those materials so that the parties may attempt to resolve Mr. Noel's case short of trial.

In light of the current status of the case, the parties jointly request that the Court continue the status hearing approximately 90 days and that time be excluded under the Speedy Trial Act to allow for the production and review of discovery, plea negotiations, and defense preparation.

Thank you for your consideration.

Respectfully Submitted,

/s

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cc: AUSA Joshua Dugan
PTSO Valeria Lopez